

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 1997  
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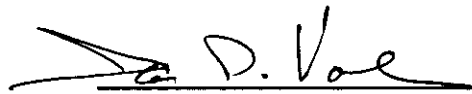
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Docket No. R97-1

## FIRST SET OF INTERROGATORIES OF THE ADVERTISING MAIL MARKETING ASSOCIATION TO USPS WITNESS HATFIELD (AMMA/USPS-LR-H-130-1-2)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,



\_\_\_\_\_  
Ian D. Volner  
N. Frank Wiggins  
Counsel to Advertising Mail Marketing  
Association

**AMMA/USPS-LR-H-130-1**

The following questions refer to the "Data Collection Period" discussed in the "Data Collection Packet" of LR-H-130.

- a. Please confirm that the data collection took place on Monday through Friday (no Saturdays or Sundays) beginning February 24, 1997 and ending March 7, 1997 for a total of ten (10) consecutive work days plus "two scheduled contingency days" (March 10 and 11).
- b. If you cannot confirm part a., please provide the correct dates.
- c. How and why was this particular ten (10) day period chosen?
- d. Did you or anyone else test the implicit assumption of the users of these data that the information collected and parameters estimated by the sample study are not subject to seasonal fluctuations?
- e. If the answer to part d is "yes", please provide all analyses of the test(s)?
- f. If the answer to part d is "no", what was the justification for making the assumption described in part d?

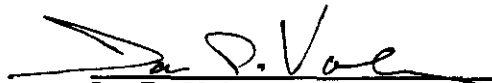
**AMMA/Hatfield USPS-LR-130-2**

USPS Witness Daniel (USPS-T-29 Appendix I page 40 of 43) cites LR-H-130 as the source of Standard (A) acceptance rates. Please explain all of the differences between Witness Daniel's rates and terminology on the page cited in Witness Daniel's testimony and the rates and terminology in Tables 5.1, 5.2 and 5.3 on page 10 of LR-H-130.

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE:           October 30, 1997

  
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Ian D. Volner